



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**

Memphis Environmental Field Office  
8383 Wolf Lake Drive  
Bartlett, TN 38133  
Phone 901-371-3000    Statewide 1-888-891-8332    Fax 901-371-3170

April 26, 2017

Mayor Mike Wissman  
City of Arlington  
P.O. Box 507  
Arlington, TN 38002

Re:    Arlington Pretreatment Program  
      NPDES Permit No. TN0078603  
      Shelby County

Dear Mayor Wissman:

On April 18, 2017, Mr. Eddy Bouzeid with the Division of Water Resources, Memphis Environmental Field Office, conducted a Pretreatment Compliance Inspection (PCI) of the Town of Arlington's industrial pretreatment program. Mr. Bouzeid met with and was assisted by Mr. Andy Wehl, the Town of Arlington Pretreatment Coordinator and Mr. Terry Perkins, the Sewage Treatment Plant (STP) Manager. Their assistance and availability during the inspection was greatly appreciated.

The Arlington pretreatment program includes four Significant Industrial Users (SIUs): two are Categorical Industrial Users (CIUs) and two are Non Categorical Industrial Users (NCIUs). The two CIUs are MicroPort Orthopedics and Wright Medical. The two NCIUs are Rich Products and Mid-South Septic Service.

During the PCI, Mr. Bouzeid reviewed the discharge permit of one of the SIUs, Mid-South Septic Service, discussed the industry's compliance status with your staff, and conducted an oversight inspection at the facility. The following items describe specific issues that were discovered during the review of Mid-South Septic discharge permit. The issues are noted as follows:

- a. A certification statement is required to accompany the SIU's self-monitoring reports and the statement needs to be certified by an authorized

representative of the facility as per Pretreatment Requirements 0400-40-14-.12 (f). During the review of Mid-South Septic file, certification statements were not available for review. Your staff was made aware of this deficiency and this matter was brought to the attention of Mid-South Septic officials during the IU's site visit. Your staff and the facility's personnel assured Mr. Bouzeid that this matter will be addressed and that certified statements will start accompanying all the facility's self-monitoring reports.

- b. Mid-South Service discharge permit requires that a composite sample be collected for BOD. Mid-South Septic conducts batch discharges and grab samples were being collected instead of composite samples. Your staff informed Mr. Bouzeid during the inspection that the Town and its consultant, Tetra Tech, had scheduled a meeting with Mid-South Septic officials to discuss and address this issue. Your staff was advised to revise the facility's discharge permit once a proper sampling procedure is determined.

Meanwhile, the Town's revised Legal Authority, the Sewer Use Ordinance (SUO) and the Enforcement Response Plan (ERP), were reviewed by the Nashville Central Office, Division of Water Resources and preliminary approval was given. At the time of the inspection, the Town had published its approved SUO and ERP for public comments. The comment period expires on May 12, 2017. Following the comment period, the Town is to submit to the Nashville Central office the following:

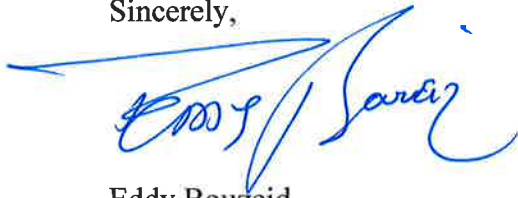
- A notarized statement from the newspaper publisher, attesting that the notice was published.
- A copy of the notice
- A copy of all comments and any responses by the Town.

Following the receipt of the public comment information, the Division will give final approval of the Legal Authority, provided that public comments have been dealt with satisfactory.

Furthermore, the Town's Local Limits and the Sewage Treatment Plant Protection Criteria were also approved by the Division.

Thank you for your staff's cooperation during the inspection. It appears that the Town's pretreatment program has evolved and improved since the last pretreatment inspection. Your staff have enhanced their knowledge of the pretreatment regulations and has built a partnership/network with the industries which helps to overcome and resolve issues should they arise. If you have any questions or comments with regard to the inspection please contact me at (901) 371-3023 or [eddy.bouzeid@tn.gov](mailto:eddy.bouzeid@tn.gov).

Sincerely,



Eddy Bouzeid  
Environmental Protection Specialist  
Division of Water Resources  
Memphis Environmental Field Office

cc: Laurel Rognstad- TDEC/DWR/NCO

ec : Cathy Durant – Arlington Town Administrator  
Terry Perkins – Arlington STP Manager  
Andy Wehl - Arlington Pretreatment Coordinator